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*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RUDOLPH ERB, *et al.*,

Plaintiffs,

**-against-**

THE REPUBLIC OF ARGENTINA,

Defendant.

07 CV 11495 (TPG)

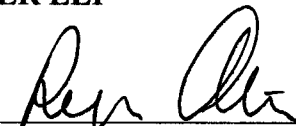
**NOTICE OF MOTION**

PLEASE TAKE NOTICE THAT upon the annexed declarations of plaintiff Jose L. Peluso, dated April 17, 2008, with annexed exhibits, plaintiff Silvia Beatriz Ovejero, dated April 14, 2008, with annexed exhibits, plaintiff Rudolf Erb, dated April 10, 2008, plaintiff Eduardo Hector Sorroche, dated April 22, 2008, with annexed exhibits, plaintiff Cesare De Iuliis, dated May 9, 2008, with annexed exhibits, and Regina Alter, dated June 25, 2008, with annexed exhibits; the Statement of Material Facts Pursuant to Local Rule 56.1; the accompanying Memorandum of Law; and the pleadings and all prior proceedings had herein, the undersigned will move this Court before the Honorable Thomas P. Griesa, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York, at such time as the Court directs, for an Order, pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting plaintiffs summary judgment as against

defendant the Republic of Argentina, to strike defendant's discovery requests and for such other relief as the Court deems just and proper.

Dated: New York, New York  
June 25, 2008

**DREIER LLP**

By: 

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